

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

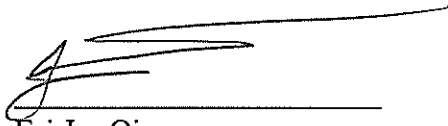
<div>CITY OF PROVIDENCE, RHODE ISLAND, Individually and on Behalf of Others Similarly Situating, Plaintiff, -against- BATS GLOBAL MARKETS, INC., <i>et al.</i>, Defendants.</div>	Civil Action No. 14-cv-2811 (JMF)
<div>AMERICAN EUROPEAN INSURANCE COMPANY, Individually and on Behalf of Others Similarly Situated, Plaintiff, -against- BATS GLOBAL MARKETS, INC., <i>et al.</i>, Defendants.</div>	Civil Action No. 14-cv-3133 (JMF)
<div>HAREL INSURANCE CO., LTD. Individually and on Behalf of Others Similarly Situating, Plaintiff, -against- BATS GLOBAL MARKETS, INC., <i>et al.</i>, Defendants.</div>	Civil Action No. 14-cv-3608 (JMF)
<div>JAMES J. FLYNN and DOMINIC A. MORELLI, Individually and on behalf of all others similarly situated, Plaintiffs, -against- BANK OF AMERICA CORPORATION, <i>et al.</i>, Defendants.</div>	Civil Action No. 14-cv-4321 (JMF)

DECLARATION OF FEI-LU QIAN

I, Fei-Lu Qian, declare as follows:

1. I am an associate in the law firm of Wolf Popper LLP, attorneys for proposed Lead Plaintiff Applied Financial Science, Inc. in the above-captioned actions.
2. I submit this Declaration in support of entry of an order (i) consolidating the above-captioned actions and all related actions subsequently filed, removed, or transferred to this Court; (ii) appointing Applied Financial Science, Inc. as Lead Plaintiff; (iii) approving Applied Financial Science, Inc.'s selection of Wolf Popper LLP as Lead Counsel for the Class; and (iv) granting any other relief that this Court may deem proper.
3. Attached hereto as Exhibit A is the press release published by Robbins Geller Rudman & Dowd LLP on April 18, 2014, providing the required notice to the Class.
4. Attached hereto as Exhibit B is the Plaintiff Certification under the Federal Securities Laws.
5. Attached hereto as Exhibit C is the Affidavit of Michele Marotta.
6. Attached hereto as Exhibit D is the firm biography of Wolf Popper LLP

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief, this 17th day of June 2014.



Fei-Lu Qian